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Executive Director
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Southern District of New York
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January 7, 2020

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

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**Re: United States v. Joseph Bagaglia,
19 Cr. 342 (LGS)**

Dear Judge Schofield:

I write with the consent of the government to request an adjournment of the January 7, 2020 status conference in this matter. I will shortly be sending a written memorandum to the government requesting the reduction of the charges against Mr. Bagaglia, with the aim of reaching a pre-trial disposition of this case. Having conferred with the government, which represents that it will need time for its review of my submission, we respectfully request that the Court adjourn this matter for approximately two months, and specifically to the week of March 16, if the Court has availability that week.

The government consents to the requested adjournment and seeks the exclusion of time under the Speedy Trial Act. I consent to the exclusion of time until the next conference under 18 U.S.C. § 3161(h)(7).

Application Granted. The status conference currently scheduled for January 9, 2020 is adjourned to **March 17, 2020 at 11:00 a.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and March 17, 2020 outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and March 17, 2020 is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 25.

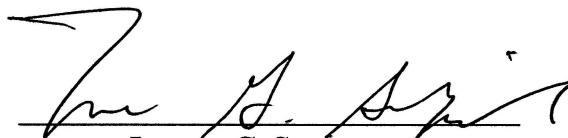
Respectfully submitted,

/s/

Clay H. Kaminsky
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8749

cc: AUSA Ni Qian

Date: January 8, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE